

I N D I C T M E N T

[21 U.S.C. § 963: Conspiracy to Manufacture and Distribute Cocaine for the Purpose of Unlawful Importation; 18 U.S.C. § 924(o): Conspiracy to Possess Firearms, Machineguns, and Destructive Devices in Furtherance of a Drug Trafficking Offense; 21 U.S.C. §§ 959(a), 960(b)(1)(B)(ii): Distribution of Cocaine for the Purpose of Unlawful Importation; 18 U.S.C. §§ 924(c)(1)(A)(i), (c)(1)(B)(ii): Possession of Firearms, Machineguns, and Destructive Devices in Furtherance of a Drug Trafficking Offense; 18 U.S.C. § 2(b): Causing an Act to be Done; 21 U.S.C. §§ 853, 970; 18 U.S.C. § 924(d)(1), 28 U.S.C. § 2461(c): Criminal Forfeiture]

1 COUNT ONE

2 [21 U.S.C. § 963]

3 [ALL DEFENDANTS]

4 A. OBJECT OF THE CONSPIRACY

5 Beginning on an unknown date, but no later than on or about
6 March 25, 2023, and continuing until on or about March 27, 2024, in
7 the countries of Colombia, Netherlands, the Czech Republic, and
8 elsewhere, defendants IVAN JACOBO IDROBO ARREDONDO, also known as
9 ("aka") "Marlon Vasquez," JORGE ELIECER LUQUE MONSALVE, aka "Jorge
10 Col," JUAN DIEGO PALTA MONTERO, aka "Juan Diego Palta Moreno," aka
11 "Ñeque," RUBEN DARIO GARCIA LONDOÑO, aka "Bencho," DANY ROJAS CAMPO,
12 and FIRST NAME UNKNOWN and LAST NAME UNKNOWN, aka "Venado" ("FNU
13 LNU"), each of whom will be arrested and first brought to the Central
14 District of California, and others known and unknown to the Grand
15 Jury, conspired and agreed with each other to knowingly and
16 intentionally manufacture and distribute at least five kilograms of a
17 mixture and substance containing a detectable amount of cocaine, a
18 Schedule II narcotic drug controlled substance, intending, knowing,
19 and having reasonable cause to believe that such substance would be
20 unlawfully imported into the United States, in violation of Title 21,
21 United States Code, Sections 959(a), 960(a)(3), and (b)(1)(B)(ii).

22 B. MANNER AND MEANS OF THE CONSPIRACY

23 The object of the conspiracy was to be accomplished, in
24 substance, as follows:

25 1. Defendants IDROBO, LUQUE, and FNU LNU would own and operate
26 laboratories throughout Colombia that manufactured and distributed
27 cocaine.

1 2. Defendants LUQUE, GARCIA, ROJAS, and FNU LNU, in
2 laboratories throughout Colombia, would manufacture cocaine for
3 importation into the United States and elsewhere.

4 3. Defendants IDROBO, LUQUE, PALTA, and GARCIA would negotiate
5 the sale of cocaine believing it would be imported into the United
6 States, and distributed within the Central District of California,
7 with people they believed to be drug traffickers.

8 4. Defendants IDROBO, LUQUE, PALTA, and ROJAS would negotiate
9 with people they believed to be drug traffickers for the exchange of
10 firearms and ammunition, including, machineguns, grenades,
11 destructive devices, and rifles, for cocaine that they believed would
12 be imported into the United States and distributed within the Central
13 District of California.

14 5. Defendants LUQUE, GARCIA, ROJAS, and FNU LNU would store
15 cocaine in cocaine laboratories and residences in Colombia.

16 6. Defendants LUQUE and GARCIA would transport and distribute
17 cocaine for the purpose of its importation into the United States to
18 people they believed to be drug traffickers.

19 7. Defendants LUQUE and PALTA would coordinate the
20 transportation of firearms and destructive devices used as payment
21 for cocaine that they believed would be imported into the United
22 States.

23 C. OVERT ACTS

24 On or about the following dates, in furtherance of the
25 conspiracy and to accomplish its object, defendants IDROBO, LUQUE,
26 PALTA, GARCIA, ROJAS, and FNU LNU, together with others known and
27 unknown to the Grand Jury, committed and caused to be committed

1 various overt acts in the countries of Colombia, the Czech Republic,
2 and the Netherlands, including, but not limited to, the following:

3 Overt Act No. 1: On May 3, 2023, in Cali, Valle del Cauca,
4 Colombia, defendants LUQUE and GARCIA, and a co-conspirator met with
5 persons they believed to be drug traffickers with connections and
6 drug routes into the United States, but who were, in fact, a
7 confidential source working with the United States Drug Enforcement
8 Administration ("CS-1") and an undercover agent with the Colombian
9 National Police ("UC-1"). At this meeting, in coded language,
10 defendants LUQUE and GARCIA agreed to provide CS-1 and UC-1
11 approximately seven kilograms of cocaine in Cali, Colombia, for
12 importation into and distribution within the United States.

13 Overt Act No. 2: On May 3, 2023, in Cali, Valle del Cauca,
14 Colombia, defendant LUQUE asked CS-1 if defendant LUQUE could invest
15 in 0.5 kilograms of the seven kilograms of cocaine destined for the
16 United States in exchange for a cut of the profits from its sale in
17 the United States.

18 Overt Act No. 3: On May 3, 2023, in Jamundi, Valle del Cauca,
19 Colombia, defendants LUQUE and GARCIA gave CS-1 a tour of a cocaine
20 laboratory that was manufacturing and packaging seven kilograms of
21 cocaine.

22 Overt Act No. 4: On May 5, 2023, in WhatsApp messages,
23 defendant GARCIA asked UC-1 to call him to discuss the delivery of
24 seven kilograms of cocaine.

25 Overt Act No. 5: On May 6, 2023, in WhatsApp messages,
26 defendant GARCIA coordinated with UC-1 the delivery of seven
27 kilograms of cocaine.

1 Overt Act No. 6: On May 6, 2023, in Cali, Valle del Cauca,
2 Colombia, defendants LUQUE and GARCIA drove to meet with UC-1 and CS-
3 1 at a parking lot in order to deliver cocaine. At the parking lot,
4 defendant GARCIA transferred approximately seven kilograms of a
5 mixture and substance containing a detectable amount of cocaine to
6 CS-1 and UC-1, packaged in materials depicting the Los Angeles Galaxy
7 soccer team, in exchange for Colombian pesos worth approximately
8 \$10,715 USD, as depicted in the below photograph.



19 Overt Act No. 7: On July 31, 2023, in Cali, Valle del Cauca,
20 Colombia, defendants LUQUE and GARCIA met with CS-1 and UC-1 at a
21 food court and, in coded language, discussed future cocaine
22 transactions, transporting cocaine overseas, and meeting with
23 defendant IDROBO regarding drug deals.

24 Overt Act No. 8: On July 31, 2023, in Cali, Valle del Cauca,
25 Colombia, defendant LUQUE accepted \$4,500 USD from CS-1 and UC-1 as
26 payment for his investment in 0.5 kilograms of cocaine that defendant
27 LUQUE believed was imported and distributed within the United States.

1 Overt Act No. 9: On October 17, 2023, during a telephone
2 conversation, using coded language, defendant LUQUE discussed trading
3 cocaine for firearms with CS-1 and a person he believed to be an arms
4 trafficker but who was, in fact, a confidential source for the United
5 States Drug Enforcement Administration ("CS-2"). During the same
6 conversation, using coded language, defendant LUQUE, on behalf of
7 defendant IDROBO, negotiated with CS-2 a trip where defendant LUQUE
8 would send someone to review the firearms and CS-2 would visit
9 defendant LUQUE's cocaine laboratories.

10 Overt Act No. 10: On November 3, 2023, in Villa Rica, Valle
11 del Cauca, Colombia, defendants ROJAS and LUQUE, on behalf of
12 defendant IDROBO, met with CS-1 and requested travel arrangements to
13 review the firearms that would be used as payment for cocaine.

14 Overt Act No. 11: On December 3, 2023, defendant ROJAS, on
15 behalf of defendants IDROBO and LUQUE, traveled to Prague, Czech
16 Republic, with CS-1 to review and examine firearms that would be
17 traded for cocaine imported into the United States.

18 Overt Act No. 12: On December 6, 2023, in Prague, Czech
19 Republic, defendant ROJAS, on behalf of defendants IDROBO and LUQUE,
20 met with a person he believed to be an arms dealer but who was, in
21 fact, a confidential source for the Drug Enforcement Administration
22 ("CS-3"), and traveled to a warehouse in Prague, Czech Republic.
23 There, defendant ROJAS met with a person he believed was an arms
24 dealer but who was, in fact, a Czech law enforcement officer, acting
25 in an undercover capacity ("UC-2"), and another person he believed
26 was an arms dealer but who was, in fact, a confidential source with
27 the Drug Enforcement Administration ("CS-4"). At the warehouse, as
28 part of the drugs-for-guns trade, defendant ROJAS reviewed,

1 inspected, and held numerous firearms, machineguns, and destructive
2 devices, including Ruchnoi Protivotankovy Granatomet rocket-
3 propelled grenade launchers, Samopal, Model 58, 7.62 caliber
4 submachineguns, and UK-59, model 1959, 7.62x54mm caliber belt-fed
5 machineguns, as depicted in the below photograph.



14 Overt Act No. 13: On December 6, 2023, in Prague, Czech
15 Republic, defendant ROJAS, on behalf of defendants IDROBO and LUQUE,
16 using coded language, discussed with CS-3 the exchange of cocaine for
17 firearms and the delivery of firearms at a port in Colombia
18 controlled by the Revolutionary Armed Forces of Colombia ("FARC").
19 During the same conversation, defendant ROJAS discussed how the
20 organization he was a member of would use rocket-propelled grenade
21 launchers to shoot at the Colombian Presidential Palace and Colombian
22 Army helicopters to force the Colombian government to respect the
23 organization.

24 Overt Act No. 14: On December 8, 2023, in a telephone
25 conversation, defendant LUQUE, on behalf of defendant IDROBO, agreed
26 with CS-1 and CS-2 to arrange an in-person meeting between defendant
27 IDROBO and CS-1 and CS-2, and for CS-2 to visit cocaine laboratories
28 run by defendants IDROBO and LUQUE.

1 Overt Act No. 15: On December 14, 2023, in Betulia, Suarez,
2 Valle del Cauca, Colombia, defendant LUQUE drove CS-1 to a residence
3 to meet with defendants IDROBO and PALTA for the purpose of
4 discussing the exchange of firearms, machineguns, destructive
5 devices, and ammunition for cocaine.

6 Overt Act No. 16: On December 14, 2023, in Betulia, Suarez,
7 Valle del Cauca, Colombia, defendants IDROBO, LUQUE, and PALTA met
8 with CS-1 and discussed the weapons shown to defendant ROJAS in the
9 Czech Republic. During this recorded meeting, defendants IDROBO,
10 LUQUE, and PALTA analyzed and calculated the costs of firearms,
11 machineguns, destructive devices, and ammunition offered by CS-2.
12 During this meeting, defendants IDROBO, LUQUE, and PALTA agreed to
13 provide to CS-1 20 kilograms of cocaine for importation into the
14 United States, and distributed in Los Angeles, California, and
15 stamped and contained in packaging with the word "Hollywood", in
16 exchange for firearms, machineguns, destructive devices, ammunition,
17 and money.

18 Overt Act No. 17: On December 14, 2023, in a telephone
19 conversation, defendant LUQUE, using coded language, discussed with
20 CS-1 and CS-2 his conversations with defendant IDROBO about the
21 firearms shown to defendant ROJAS in the Czech Republic and the
22 exchange of cocaine for firearms and money.

23 Overt Act No. 18: On December 18, 2023, in Signal messages,
24 defendant LUQUE, using coded language, discussed with CS-2 the
25 transportation and delivery of 20 kilograms of cocaine and the
26 transportation and delivery of firearms that would be used to
27 purchase a portion of the 20 kilograms of cocaine.

1 Overt Act No. 19: On December 19, 2023, in Betulia, Suarez,
2 Valle del Cauca, Colombia, defendant FNU LNU transported CS-1 to a
3 concealed cocaine laboratory that was producing and packaging 21
4 kilograms of cocaine for the importation into the United States.

5 Overt Act No. 20: On December 19, 2023, in Betulia, Suarez,
6 Valle del Cauca, Colombia, defendants LUQUE, GARCIA, and FNU LNU, on
7 behalf of defendants IDROBO and PALTA, met with CS-1 at a cocaine
8 laboratory that was producing and packaging 21 kilograms of cocaine
9 that were stamped with "Hollywood," as depicted in the below
10 photograph, and intended to be imported into the United States, and
11 discussed the process of manufacturing, packaging, and transporting
12 cocaine.



26 Overt Act No. 21: On December 21, 2023, in Signal messages,
27 defendant LUQUE ordered from CS-2 50 AK-47 rifles, 10,000 AK-47
28 rounds of ammunition, six rocket-propelled grenade launchers, 100

1 rocket-propelled grenades, 10,000 rounds of .762 ammunition, 10,000
2 rounds of 2.23 ammunition, 100 grenades, 12 machineguns, and 300
3 banana clips for AK-47 rifles.

4 Overt Act No. 22: On December 21, 2023, in Jamundi, Valle del
5 Cauca, Colombia, defendant GARCIA traveled with CS-1 to a parking lot
6 in Cali, Colombia, to meet with a person he believed to be a drug
7 customer but who was, in fact, an undercover agent with the Colombian
8 National Police ("UC-3") to deliver 21 kilograms of cocaine that were
9 intended to be imported into the United States.

10 Overt Act No. 23: On December 21, 2023, in Cali, Colombia,
11 defendant GARCIA distributed approximately 21 kilograms of a mixture
12 and substance containing a detectable amount of cocaine that were
13 packaged in materials depicting the "Hollywood" sign to CS-1 and
14 UC-3, as depicted in the below photographs.





Overt Act No. 24: On January 18, 2024, in Cali, Colombia, defendant LUQUE met with CS-1, CS-2, UC-3 and accepted \$8,000 USD in payment for his investment in one kilogram of the 21 kilograms of cocaine provided to CS-1 and UC-3 on December 21, 2023. In the same meeting, using coded language, defendant LUQUE discussed the transport and importation and distribution of cocaine in the United States.

Overt Act No. 25: On January 18, 2024, in Cali, Colombia, defendant LUQUE, on behalf of defendant IDROBO, using coded language, negotiated with CS-1 and CS-2 to purchase and transport additional firearms, machineguns, destructive devices, and ammunition in exchange for cocaine.

Overt Act No. 26: On March 2, 2024, in Toribio, Cauca, Colombia, using coded language, defendants LUQUE and PALTA met with CS-1, toured a cocaine laboratory, and discussed the transportation and exchange of firearms for cocaine.

Overt Act No. 27: On March 2, 2024, in Tacueyo, Toribio, Cauca, Colombia, defendant LUQUE transported CS-1 to an airstrip that would be used to receive and exchange firearms for cocaine.

1 COUNT TWO

2 [18 U.S.C. § 924(o)]

3 [DEFENDANTS IDROBO, LUQUE, PALTA, AND ROJAS]

4 A. OBJECT OF THE CONSPIRACY

5 Beginning on an unknown date, but no later than on or about
6 March 25, 2023, and continuing until on or about March 27, 2024, in
7 the countries of Colombia and the Czech Republic, and elsewhere,
8 defendants IVAN JACOBO IDROBO ARREDONDO, also known as ("aka")
9 "Marlon Vasquez," JORGE ELIECER LUQUE MONSALVE, aka "Jorge Col," JUAN
10 DIEGO PALTA MONTERO, aka "Juan Diego Palta Moreno," aka "Ñeque," and
11 DANY ROJAS CAMPO, each of whom will be arrested and first brought to
12 the Central District of California, and others known and unknown to
13 the Grand Jury, conspired and agreed with each other to knowingly
14 possess firearms, machineguns, as defined in Title 18, United States
15 Code, Section 921(a)(23) and Title 26, United States Code, Section
16 5485(b), and destructive devices, as defined in Title 18, United
17 States Code, Section 921(a)(4), in furtherance of a drug trafficking
18 crime, namely, conspiracy to manufacture and distribute cocaine for
19 the purpose of unlawful importation, in violation of Title 21, United
20 States Code, Section 963, as charged in Count One of this Indictment,
21 all in violation of Title 18, United States Code, Sections
22 924(c)(1)(A)(i), (c)(1)(B)(ii).

23 B. MANNER AND MEANS OF THE CONSPIRACY

24 The object of the conspiracy was to be accomplished, in
25 substance, as follows:

26 1. Defendants IDROBO, LUQUE, PALTA, and ROJAS would negotiate
27 the pricing and purchase of firearms, machineguns, and destructive
28 devices in exchange for kilogram quantities of cocaine.

1 2. Defendants IDROBO and LUQUE would send delegates on their
2 behalf to view firearms, machineguns, and destructive devices that
3 would be exchanged for kilogram quantities of cocaine.

4 3. Defendant ROJAS would travel on behalf of defendants IDROBO
5 and LUQUE to view and handle firearms, machineguns, and destructive
6 devices that would be exchanged for kilogram quantities of cocaine.

7 4. Defendants IDROBO, LUQUE, and PALTA would order firearms,
8 machineguns, and destructive devices on behalf of a drug trafficking
9 organization in exchange for kilogram quantities of cocaine.

10 5. Defendants LUQUE and PALTA would tour airstrips in Colombia
11 to coordinate the delivery of kilogram quantities of cocaine and the
12 receipt of firearms, machineguns, and destructive devices.

13 C. OVERT ACTS

14 On or about the following dates, in furtherance of the
15 conspiracy and to accomplish its object, defendants IDROBO, LUQUE,
16 PALTA, and ROJAS, together with others known and unknown to the Grand
17 Jury, committed and caused to be committed various overt acts in the
18 countries of Colombia and the Czech Republic, including, but not
19 limited to, the following:

20 The Overt Acts 9 through 27, alleged in Count One, Section C of
21 this Indictment are re-alleged and incorporated by reference herein.

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1 COUNT THREE

2 [21 U.S.C. §§ 959(a), 960(a)(3), and (b)(1)(B)(ii); 18 U.S.C. § 2(b)]

3 [DEFENDANTS LUQUE and GARCIA]

4 On or about May 6, 2023, in the country of Colombia, defendants
5 JORGE ELIECER LUQUE MONSALVE, aka "Jorge Col," and RUBEN DARIO GARCIA
6 LONDONO, aka "Bencho," each of whom will be arrested and first
7 brought to the Central District of California, knowingly distributed,
8 and willfully caused to be distributed, at least five kilograms, that
9 is, approximately seven kilograms, of a mixture and substance
10 containing a detectable amount of cocaine, a Schedule II narcotic
11 drug controlled substance, intending, knowing, and having reasonable
12 cause to believe that such substance would be unlawfully imported
13 into the United States.

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1 COUNT FOUR
23 [21 U.S.C. §§ 959(a), 960(a)(3), and (b)(1)(B)(ii); 18 U.S.C. § 2(b)]
45 [DEFENDANTS IDROBO, LUQUE, PALTA, GARCIA, and FNU LNU]
67 On or about December 21, 2023, in the country of Colombia,
8 defendants IVAN JACOBO IDROBO ARREDONDO, also known as ("aka")
9 "Marlon Vasquez," JORGE ELIECER LUQUE MONSALVE, aka "Jorge Col," and
10 JUAN DIEGO PALTA MONTERO, aka "Juan Diego Palta Moreno," aka "Ñeque,"
11 RUBEN DARIO GARCIA LONDOÑO, aka "Bencho," and FIRST NAME UNKNOWN and
12 LAST NAME UNKNOWN, aka "Venado," each of whom will be arrested and
13 first brought to the Central District of California, knowingly
14 distributed, and willfully caused to be distributed, at least five
15 kilograms of a mixture and substance containing a detectable amount
16 of cocaine, that is, approximately 21 kilograms, a Schedule II
17 narcotic drug controlled substance, intending, knowing, and having
18 reasonable cause to believe that such substance would be unlawfully
19 imported into the United States.
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1 COUNT FIVE

2 [18 U.S.C. §§ 924(c)(1)(A)(i), (c)(1)(B)(ii), 2(b)]

3 [DEFENDANTS IDROBO, LUQUE, AND ROJAS]

4 On or about December 6, 2023, in the country of the Czech
5 Republic, defendants IVAN JACOBO IDROBO ARREDONDO, also known as
6 ("aka") "Marlon Vasquez," JORGE ELIECER LUQUE MONSALVE, aka "Jorge
7 Col," and DANY ROJAS CAMPO, each of whom will be arrested and first
8 brought to the Central District of California knowingly possessed,
9 and willfully caused to be possessed, firearms and machineguns, as
10 defined in Title 18, United States Code, Section 921(a)(23) and Title
11 26, United States Code, Section 5845(b), namely, Samopal, Model 58,
12 7.62 caliber submachineguns, and UK-59, model 1959, 7.62x54mm caliber
13 belt-fed machineguns, each of which defendants IDROBO, LUQUE, and
14 ROJAS knew to be a machine gun, and destructive devices, as defined
15 in Title 18, United States Code, Section 921(a)(4), namely, Ruchnoj
16 Protivotankovyj Granatomet rocket-propelled grenade launchers, in
17 furtherance of a drug trafficking crime, namely, conspiracy to
18 manufacture and distribute cocaine for the purpose of unlawful
19 importation, in violation of Title 21, United States Code, Section
20 963, as charged in Count One of this Indictment.

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1 FORFEITURE ALLEGATION ONE

2 [21 U.S.C. §§ 853, 970; 18 U.S.C. § 924(d)(1)]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 21,
6 United States Code, Sections 853 and 970; and Title 18, United States
7 Code, Section 924(d)(1), in the event of any defendant's conviction
8 of the offenses set forth in any of Counts One, Three, or Four of
9 this Indictment.

10 2. Any defendant so convicted shall forfeit to the United
11 States of America the following:

12 (a) All right, title and interest in any and all property,
13 real or personal, constituting or derived from, any proceeds which
14 the defendant obtained, directly or indirectly, from any such
15 offense;

16 (b) All right, title and interest in any and all property,
17 real or personal, used, or intended to be used, in any manner or
18 part, to commit, or to facilitate the commission of any such offense;

19 (c) All right, title, and interest in any firearm or
20 ammunition involved in or used in any such offense; and

21 (d) To the extent such property is not available for
22 forfeiture, a sum of money equal to the total value of the property
23 described in subparagraphs (a), (b), and (c).

24 3. Pursuant to Title 21, United States Code, Section 853(p),
25 any defendant so convicted shall forfeit substitute property if, by
26 any act or omission of said defendant, the property described in the
27 preceding paragraph, or any portion thereof: (a) cannot be located
28 upon the exercise of due diligence; (b) has been transferred, sold

1 to, or deposited with a third party; (c) has been placed beyond the
2 jurisdiction of the court; (d) has been substantially diminished in
3 value; or (e) has been commingled with other property that cannot be
4 divided without difficulty.

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1 FORFEITURE ALLEGATION TWO

2 [18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 18,
6 United States Code, Section 924(d)(1), and Title 28, United States
7 Code, Section 2461(c), in the event of any defendant's conviction of
8 the offenses set forth in any of Counts Two or Five of this
9 Indictment.

10 2. Any defendant so convicted shall forfeit to the United
11 States of America the following:

12 (a) All right, title, and interest in any firearm or
13 ammunition involved in or used in any such offense; and

14 (b) To the extent such property is not available for
15 forfeiture, a sum of money equal to the total value of the property
16 described in subparagraph (a).

17 3. Pursuant to Title 21, United States Code, Section 853(p),
18 as incorporated by Title 28, United States Code, Section 2461(c), the
19 convicted defendant shall forfeit substitute property, up to the
20 value of the property described in the preceding paragraph if, as the
21 result of any act or omission of said defendant, the property
22 described in the preceding paragraph or any portion thereof (a)
23 cannot be located upon the exercise of due diligence; (b) has been
24 transferred, sold to, or deposited with a third party; (c) has been
25 placed beyond the jurisdiction of the court; (d) has been

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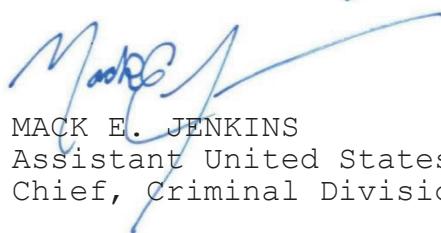
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1 substantially diminished in value; or (e) has been commingled with
2 other property that cannot be divided without difficulty.

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4 A TRUE BILL

5 /s/
6 Foreperson

7
8 E. MARTIN ESTRADA
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9
10 
11 MACK E. JENKINS
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